





Chamberlain

received

2/3/87

February 2, 1987

217

Mr. Gregory A. Roscoe  
U.S. Environmental Protection Agency  
P. O. Box 3254  
Reston, Virginia 22090

RE: Cannons Audit

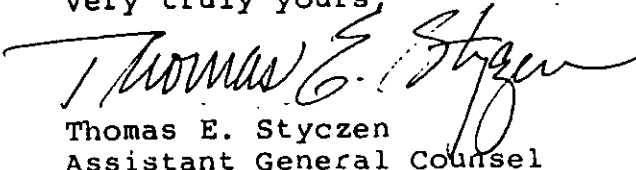
Dear Mr. Roscoe:

In conformance with E. Michael Thomas' letter of December 16, 1986 and the attached Cannons Case Ranked List Audit Procedure, please accept the enclosed submission of Chamberlain Manufacturing Corporation.

Chamberlain's review of its documents did not indicate a significant discrepancy with EPA's figures as to total volume. However, Chamberlain takes exception to the inclusion of water and oil in the volume total for the reasons stated in Exhibit 1 of the submission. In addition, though there is no notation in the Comments column, we also believe that the shipments of "forging compound" and "oil and grease", (as defined in "Notes") should similarly be excluded as non-hazardous under CERCLA.

While we understand that the audit procedure was not necessarily meant as a vehicle to raise such matters, there appeared to be no other forum, as the Steering Committee did not seem prepared to address this issue. We now understand, however, that a sub-committee of PRPs interested in this issue has been formed and will be discussing the matter with EPA. Chamberlain intends to avail itself of this forum as well.

Very truly yours,

  
Thomas E. Styczen  
Assistant General Counsel

TES:dn  
Attachment

DIF  
2nd 6/1/86

SEYFARTH, SHAW, FAIRWEATHER & GERALDSON  
55 EAST MONROE STREET  
CHICAGO, ILLINOIS 60603

LOS ANGELES OFFICE  
2029 CENTURY PARK EAST  
LOS ANGELES, CALIF. 90067  
AREA CODE 213 277-7200

AREA CODE 312 346-8000  
CABLE ADDRESS, INTERLEX  
WRITERS DIRECT DIAL (312) 269-8921

WASHINGTON, D.C. OFFICE  
1111 19TH STREET, N.W.  
WASHINGTON, D.C. 20036  
AREA CODE 202 463-2400

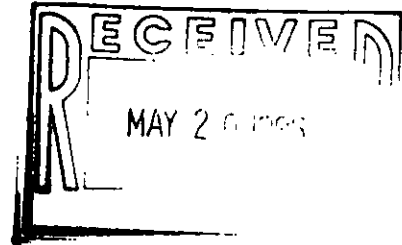
NEW YORK OFFICE  
757 THIRD AVENUE  
NEW YORK, NEW YORK 10017  
AREA CODE 212 715-9000

May 14, 1986

SAN FRANCISCO OFFICE  
44 MONTGOMERY STREET  
SAN FRANCISCO, CALIF. 94104  
AREA CODE 415 397-2823

VIA EXPRESS MAIL

Gregory A. Roscoe  
U.S. Environmental Protection Agency  
P.O. Box 3254  
Reston, Virginia 22090



Re: Cannons Engineering Corporation Sites:  
Information Request of March 28, 1986

Dear Mr. Roscoe:

As attorneys for Chamberlain Manufacturing, we submit herewith the Company's Response to the above-captioned Information Request. Please direct future correspondence to the undersigned as attorney for Chamberlain Manufacturing Corporation.

Very truly yours,

SEYFARTH, SHAW, FAIRWEATHER & GERALDSON

By

Michael F. Dolan

MFD/Ds  
Enclosure  
cc: Gregg J. Wilson, Esq.

**"Chamberlain Manufacturing Corporation's  
Responses to March 28, 1986 EPA  
Information Request"**

- I. Chamberlain Manufacturing Corporation  
New Bedford Division  
117 King Street  
New Bedford, MA 02741

Principal Place of Business:  
845 Larch Avenue  
Elmhurst, IL 60126

Chamberlain is incorporated in the State of Iowa.  
Chamberlain manufactures projectile metal parts for  
the U.S. Government and various consumer products.

- II. C T Corporation System  
2 Oliver Street  
Boston, MA 02109
- III. Donald C. Sargent  
Manager, Environmental Compliance  
Chamberlain Manufacturing Corporation  
New Bedford Division
- IV. Michael F. Dolan, Attorney, Seyfarth, Shaw, Fairweather  
& Geraldson  
Thomas E. Styczen, Asst. General Counsel, Chamberlain  
Manufacturing Corporation  
David G. Hughes, Modernization Mgr., Chamberlain  
Manufacturing Corporation, New Bedford Division  
Mahlon Machamer, Metallurgist, Chamberlain Manufacturing  
Corporation, New Bedford Division  
Raymond Belli, Waste Treatment Technician, Chamberlain  
Manufacturing Corporation, New Bedford Division  
Adeline Roderiques, Accounts Payable Supervisor,  
Chamberlain Manufacturing Corporation, New Bedford  
Division  
Rachael Buzniac, Secretary, Chamberlain Manufacturing  
Corporation, New Bedford Division  
Mary MacNamara, Procurement Contract Specialist,  
Chamberlain Manufacturing Corporation, New Bedford  
Division  
John Greulich, Purchasing Agent (retired), Chamberlain  
Manufacturing Corporation, New Bedford Division  
Toby Perry, Day Foreman, Floor Space Department,  
Chamberlain Manufacturing Corporation, New Bedford  
Division

- V. Certificates of Disposal. See enclosed documents Nos. 00000 through 00128, including Purchase Orders, Invoices and Accounts Payable Records. Other records and documents were consulted, but contained no data relevant to the Request.
- VI. Chamberlain Manufacturing Corporation contracted with Cannons Engineering to remove certain materials from its plant on an as needed basis, and to legally incinerate or dispose of those materials. When removal was required, Chamberlain personnel, generally from the Plant Engineering Department, would notify the Purchasing Department. Department personnel would call Cannons, arrange for pickup, and issue a Purchase Order. Said purchase orders required Cannons to indemnify Chamberlain Manufacturing Corporation from damages arising out of acts or omissions of Cannons in performing the agreement.
- A. See documents provided in response to Request #V.
- B. Chamberlain Manufacturing Corporation (Plant Engineering and Purchasing personnel) and Cannons Engineering Corporation.
- C. See documents presented in response to Request #V.
- D. There were four categories of waste involved in the transactions. They were:
1. Water with trace amounts of cutting oil.
    - a) No available data on chemical content
    - b) Solution of approximately 4% oil to 96% water
    - c) Used in machining of metal parts
  2. Spent Forging Lubricant
    - a) No available data on chemical content
    - b) Predominantly graphite, mineral oil, and animal fat
    - c) Used in forging of metal parts

3. Waste Water Treatment Sludge
    - a) No available data on chemical content
    - b) Diatomaceous earth, lime, water, and trace amounts of heavy metals, considered to be a non-hazardous waste.
    - c) Waste Water Treatment System
  4. Fuel Oil and Other Oils
    - a) No available data on chemical content
    - b) High B.T.U. petroleum products
    - c) Excess. Not used in plant processes.
  - E. None. See answer to D. above.
  - F. See documents provided in response to #V.
  - G. See documents provided in response to #V.
  - H. Employees of the Purchasing and Plant Engineering Departments.
  - I. Chamberlain intended that the materials be treated or disposed of in accordance with applicable law. Chamberlain understood that the materials were taken by Cannons Engineering to its Bridgewater facility.
  - J. Unknown.
  - K. Unknown.
  - L. Chamberlain required proof of proper licensing of Cannons Engineering to conduct such activities. Chamberlain inquired of Cannons' personnel of its methods of disposal and received Certificates of Disposal from Cannons which Chamberlain understood to be verification of incineration.
- VIII. None.

A F F I D A V I T

STATE OF MASSACHUSETTS     )  
                                      ) SS  
COUNTY OF BRISTOL         )

I, Donald C. Sargent, being duly sworn on oath, deposes and states as follows:

1. I am Manager, Environmental Compliance for Chamberlain Manufacturing Corporation, New Bedford Division, New Bedford, Massachusetts. My job responsibilities include supervision of environmental compliance matters for the Division.

2. I have reviewed the March 28, 1986 U.S. EPA Information Request for the Cannons Engineering Sites and have prepared the foregoing response after a diligent record search and a diligent interviewing process with present and former employees who may have knowledge of the operations, chemical use and waste disposal practices of the Company between 1974 and the present.

3. The information submitted in response to the Information Request is complete and accurate to the best of my present knowledge, information and belief.

FURTHER AFFIANT SAYETH NOT.

Dated this 8th day of May, 1986.

  
Donald C. Sargent

STATE OF MASSACHUSETTS )  
 ) SS  
COUNTY OF BRISTOL )

Before me personally appeared Donald C. Sargent, known to me to be the person who executed the foregoing instrument, on this 8th day of May.

*Alice Belina*

Notary Public

(S E A L)

My Commission Expires: February 24, 1989